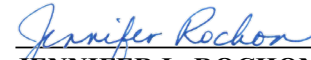


The request to adjourn the post-discovery pre-trial conference is GRANTED. It shall now be held on **May 7, 2024**, at **4:00 p.m.** in Courtroom 23B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007. If a party wishes to move for summary judgment or to exclude expert testimony, it must, no later than **April 15, 2024**, request that the conference serve as a pre-motion conference. However, the Court will not extend discovery in this eight-year-old case any further. *See* Fed. R. Civ. P. 16(b)(4) ("A schedule may be modified only for good cause and with the judge's consent."). On October 26, 2023, Magistrate Judge Willis stated that "the request for an extension of discovery is GRANTED, but only until November 3, 2023, for the sole purpose of providing Defendant time to respond to Plaintiff's outstanding requests." ECF No. 177 at 4-5 (emphasis omitted). In a letter dated November 2, 2023, Defendants requested "until November 15, 2023 to fully respond to Plaintiff's interrogatories." ECF No. 178. Magistrate Judge Willis granted the parties' request for a limited extension, ECF No. 179, and five months have since passed without further communication by the parties with the Court. Discovery is over. **SO ORDERED.**

Dated: April 2, 2024
New York, New York


JENNIFER L. ROCHON
United States District Judge

Re: Rameen Gasery v. Kalakuta Sunrise LLC, et. al. 16 Civ. 510 (ALC) (JEW)

Dear Magistrate Willis:

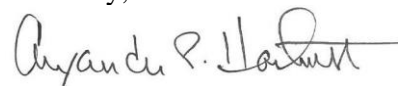
The undersigned is counsel to the Defendants in this matter. Reference is made to your Honor's Order dated March 24, 2024 (Docket No. 180) which states:

The parties shall appear for a post-discovery pre-trial conference on April 16, 2024, at 11:30 a.m. in Courtroom 23B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007. If a party wishes to move for summary judgment or to exclude expert testimony, it must, no later than April 3, 2024, request that the conference serve as a pre-motion conference. To so request, the moving party shall file a letter on ECF, not exceeding three pages, setting forth the basis for the anticipated motion, including the legal standards governing the claims at issue. Other parties shall respond by April 10, 2024. The Court will review and discuss with counsel any anticipated motions for summary judgment at the post-discovery pre-trial conference. (HEREBY ORDERED by Judge Jennifer L. Rochon) (Text Only Order) (sew) (Entered: 03/24/2024)

This letter is a respectful application:

- (a) to adjourn the date of the conference until a date after April 26, 2024, as I will be in Europe for business commencing April 15, 2024 and returning to New York on April 25, 2024. Plaintiff's counsel has no objection to this request; and
- (b) further, both Plaintiff counsel and I seek leave of this Court to conduct further discovery. Defendants have not conducted discovery "at all" for reasons I am happy to explain. As I advised you by letter dated November 2, 2023, the Defendants wish to submit interrogatories and take Plaintiff's EBT. Please be advised that Plaintiff's counsel also wishes to conduct further discovery.

Sincerely,



Alexander P Hartnett

cc: Gregory A. Sioris (via ECF)